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May 16, 2014

*Via Electronic Submission*

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room TW-A325  
Washington, D.C. 20554

*Via Hand Delivery*

Ms. Karen Majcher  
VP – High Cost and Low Income  
Universal Service Administrative Company  
2000 L Street, NW  
Suite 200  
Washington, D.C. 20036

**Re: *In the Matter of Lifeline and Link Up Reform and Modernization, WC*  
Docket No. 11-42; FCC Form 555 for The Southern New England  
Telephone Co. (Study Area Code 135200)**

Dear Ms. Dortch and Ms. Majcher:

Attached to an accompanying cover letter, please find the 2014 FCC Form 555 for The Southern New England Telephone Co.

Please contact me if you have any questions.

Sincerely,

**/s/ Anisa Latif**

Anisa Latif

Attachments

Cc: Suzanne Tetreault  
Radhika Karmarkar



Mel Coker  
Chief Marketing Officer – Home Solutions  
208 South Akard Street, Suite 3516  
Dallas, Texas 75202  
214-757-5860 Office

May 16, 2014

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., SW  
Washington, DC 20554

**Re: Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42;  
Copy of FCC Form 555 for The Southern New England Telephone Co.**

Dear Ms. Dortch:

Please find enclosed the 2014 FCC Form 555 for The Southern New England Telephone Co. ("AT&T Connecticut").

As representatives of AT&T Connecticut have explained to senior USAC and FCC Wireline Competition Bureau staff in separate discussions, AT&T Connecticut commenced an internal review of its Lifeline subscriber base at the beginning of the year. During the course of that review, AT&T Connecticut reviewed Lifeline subscriber documentation and identified some number of subscribers it should remove from its prior FCC Forms 497. After that review, it identified a small fraction of subscribers for which it currently is not able to confirm that it has complete or current certifications of eligibility. Specifically, AT&T Connecticut identified an error rate of 0.5% out of a statistically valid sample, with a 95% confidence level that the error rate in the total population would be between 0.2% and 0.8%. As a result of this review, AT&T Connecticut has reduced further the number of retail subscribers for whom it is seeking Lifeline reimbursement by the high end of this range, 0.8%, for June 2012 through December 2013. Additionally, AT&T Connecticut has reduced retroactively the number of retail subscribers for whom it is seeking Lifeline reimbursement by 15% for January 2009 through May 2012 to address the documentation issues it identified during its review.

It was AT&T Connecticut's preference to provide the explanation in the preceding paragraph on the Form 555 itself. However, I understand that USAC will not accept FCC- and OMB-approved forms that have been modified in any way by third parties without written approval from the FCC and, instead, USAC indicated that AT&T's eligible telecommunications carrier ("ETC") affiliates, including AT&T Connecticut, could provide this information in a cover letter. I further understand that AT&T's ETC representatives were not successful in their efforts to have the FCC provide USAC such written approval so that AT&T's ETCs could provide the information about their *de minimis* error rates and their decision to seek less reimbursement on the Form 555 itself but that FCC staff had no objection to AT&T's ETCs providing the



Mel Coker  
Chief Marketing Officer – Home Solutions  
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information in a cover letter. Consequently, AT&T Connecticut is providing this information in a cover letter.

Please do not hesitate to contact me immediately if you have any questions about the information provided in this cover letter or if you desire any further information.

Very truly yours,

A handwritten signature in cursive script that reads "Mel Coker".



**Annual Lifeline Eligible Telecommunications Carrier Certification Form**  
All carriers must complete all or portions of all sections  
Form must be submitted to USAC and filed with the Federal Communications Commission

**IMPORTANT: PLEASE READ INSTRUCTIONS FIRST**

***Deadline: January 31<sup>st</sup> (Annually)***

**Connecticut**

State

*(An Eligible Telecommunications Carrier (ETC) must provide a certification form for each state in which it provides Lifeline service).*

**135200**

Study Area Code(s) (SAC)

**AT&T Inc.**

Holding Company Name(s)

**The Southern New England Telephone Co.**

ETC Name(s)

**AT&T Connecticut**

DBA, Marketing or Other Branding Name(s)

Affiliated ETCs (include names and SACs, attach additional sheets if necessary)

**see page 5**

*Provide a list of all ETCs that are affiliated with the reporting ETC. Affiliation shall be determined in accordance with section 3(2) of the Communications Act. That Section defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person." 47 U.S.C. § 153(2). See also 47 C.F.R. § 76.1200.*


For purposes of this filing, an officer is an occupant of a position listed in the article of incorporation, articles of formation, or other similar legal document. An officer is a person who occupies a position specified in the corporate by-laws (or partnership agreement), and would typically be president, vice president for operations, vice president for finance, comptroller, treasurer, or a comparable position. If the filer is a sole proprietorship, the owner must sign the certification

**Section 1: All ETCs MUST COMPLETE SECTION 1– Initial Certification**

I certify that the company listed above has certification procedures in place either to:

A) Review income and program-based eligibility documentation prior to enrolling a consumer in the Lifeline program, and that, to the best of my knowledge, the company was presented with documentation of each consumer's household income and/or program-based eligibility prior to his or her enrollment in Lifeline or

B) Confirm consumer eligibility by relying upon access to a state database and/or notice of eligibility from the state Lifeline administrator prior to enrolling a consumer in the Lifeline program.

I am an officer of the company named above. I am authorized to make this certification for the Study Area(s) listed above. Initial 

**Section 2: All ETCs MUST COMPLETE SECTION 2—Annual Recertification**

*Do not leave empty columns. If an ETC has nothing to report in a column, enter a zero.*

A	B	C
Number of Subscribers Claimed on February FCC Form(s) 497 of current Form 555 calendar year	Number of Lines Claimed on February FCC Form(s) 497 of current Form 555 calendar year provided to Wireline Resellers	Number of Subscribers claimed on the February FCC Form(s) 497 that were initially enrolled in current Form 555 calendar year
9,113	0	386

*Initial the certifications below that apply to your ETC and complete the tables corresponding to the certification below. Depending on the state, BOTH CERTIFICATION A AND B MAY APPLY.*

- A) I certify that the company listed above has procedures in place to recertify the continued eligibility of all of its Lifeline subscribers, and that, to the best of my knowledge, the company obtained signed certifications from all subscribers attesting to their continuing eligibility for Lifeline. Results are provided in the chart below. I am an officer of the company named above. I am authorized to make this certification for the Study Area(s) listed above.

Initial me

D	E	F = D-E	G	H = (F+G)	I
Number of Subscribers ETC Contacted Directly to Recertify Eligibility Through Attestation	Number of Subscribers Responding to ETC Contact	Number of Non-Responding Subscribers	Number of Subscribers Responding That They Are No Longer Eligible	Number of Subscribers De-enrolled or Scheduled to be De-Enrolled as a Result of Non-Response or Ineligibility	Number of Subscribers Who De-Enrolled Prior to Recertification Attempt
10,088	6,322	3,766	0	3,766	0

**AND/OR**

*In the space below, please list the program eligibility data sources, such as ETC access to a state database and/or notice of eligibility from the state Lifeline administrator or the Universal Service Administrative Company (USAC), and indicate for which qualifying programs (e.g., SNAP, SSI) these sources are used to verify subscriber eligibility. If any of subscribers are subsequently contacted directly by the ETC in an attempt to recertify eligibility, those subscribers should be listed in columns D through I as appropriate and not in columns J through L.*

- B) I certify that the company listed above has procedures in place to re-certify consumer eligibility by relying on \_\_\_\_\_. Results are provided in the chart below. I am an officer of the company named above. I am authorized to make this certification for the Study Area(s) listed above. Initial \_\_\_\_\_

J	K	L
Number of Subscribers Whose Eligibility was Reviewed By State Administrator ETC Access to Eligibility Data or by USAC	Number of Subscribers De-Enrolled or Scheduled to be De-Enrolled as a Result of Finding of Ineligibility by State Administrator, ETC Access to Eligibility Data or USAC	Number of Subscribers Who De-Enrolled Prior to Recertification Attempt
0	0	0

**OR**

- C) I certify that my company did not claim federal low income support for any Lifeline subscribers for the February Form 497 data month for the current Form 555 calendar year. I am an officer of the company named above. I am authorized to make this certification for the Study Area(s) listed above. Initial \_\_\_\_\_



**Section 3: ALL ETCS MUST COMPLETE SECTION 3 – De-enroll percentage**

**What is the percentage of subscribers de-enrolled for this ETC?**

<b>M</b>	<b>N</b>	<b>O</b>	<b>P = N + O</b>	<b>Q = ((P ÷ M) * 100)</b>
Number of Subscribers Claimed on February FCC Form(s) 497  (From Column A)	Number of Subscribers De- Enrolled or Scheduled to be De-Enrolled as a Result of Non-Response or Ineligibility (From Column H)	Number of Subscribers De- Enrolled or Scheduled to be De-Enrolled as a Result of a Finding of Ineligibility (From Column K)	Total Number of Subscribers De-Enrolled or Scheduled to be De-Enrolled	Percentage of Subscribers De-Enrolled or Scheduled to be De-Enrolled that were Claimed on the February FCC Form(s) 497
9,113	3,766	0	3,766	41.3%

**Section 4: ALL ETCS MUST COMPLETE APPROPRIATE CHECK BOX; PRE-PAID ETCS MUST COMPLETE ALL OF SECTION 4**

**Is the ETC Pre-Paid?**

Yes ☐ No ☒ (A Pre-Paid ETC does not assess or collect a monthly fee from its Lifeline subscribers)

If yes, record the number of subscribers de-enrolled for non-usage by month in column S below.

**Non-Usage Results Applicable to Pre-Paid ETCS:**

<b>R</b>	<b>S</b>
<b>Month</b>	<b>Subscribers De-Enrolled for Non-Usage</b>
January	
February	
March	
April	
May	
June	
July	
August	
September	
October	
November	
December	

**Signature Block: ALL ETCS MUST COMPLETE SIGNATURE FIELDS**

By signing below, I certify that the company listed above is in compliance with all federal Lifeline certification procedures. I am an officer of the company named above. I am authorized to make this certification for the Study Area(s) listed above.

Hel Cohen

Person Completing this Certification Form

5-16-14

Contact Phone Number

[illegible][illegible][illegible]

### Affiliated ETCs

SAC	Name
549004	AT&T CORP
639005	AT&T MOBILITY PUERTO RICO, INC.
199009	AT&T MOBILITY, LLC
259908	AT&T MOBILITY, LLC
399015	AT&T MOBILITY, LLC
529910	AT&T MOBILITY, LLC
539010	AT&T MOBILITY, LLC
215191	BELLSOUTH TELECOMMUNICATIONS, LLC
225192	BELLSOUTH TELECOMMUNICATIONS, LLC
235193	BELLSOUTH TELECOMMUNICATIONS, LLC
245194	BELLSOUTH TELECOMMUNICATIONS, LLC
255181	BELLSOUTH TELECOMMUNICATIONS, LLC
265182	BELLSOUTH TELECOMMUNICATIONS, LLC
275183	BELLSOUTH TELECOMMUNICATIONS, LLC
285184	BELLSOUTH TELECOMMUNICATIONS, LLC
295185	BELLSOUTH TELECOMMUNICATIONS, LLC
409034	CRICKET COMMUNICATIONS, INC.
459009	CRICKET COMMUNICATIONS, INC.
549009	CRICKET COMMUNICATIONS, INC.
469012	CRICKET COMMUNICATIONS, INC.
579006	CRICKET COMMUNICATIONS, INC.
229023	CRICKET COMMUNICATIONS, INC.
479014	CRICKET COMMUNICATIONS, INC.
349028	CRICKET COMMUNICATIONS, INC.
329017	CRICKET COMMUNICATIONS, INC.
419025	CRICKET COMMUNICATIONS, INC.
269035	CRICKET COMMUNICATIONS, INC.
189008	CRICKET COMMUNICATIONS, INC.
429012	CRICKET COMMUNICATIONS, INC.
239027	CRICKET COMMUNICATIONS, INC.
379024	CRICKET COMMUNICATIONS, INC.
499014	CRICKET COMMUNICATIONS, INC.
559014	CRICKET COMMUNICATIONS, INC.
159025	CRICKET COMMUNICATIONS, INC.
309011	CRICKET COMMUNICATIONS, INC.
439053	CRICKET COMMUNICATIONS, INC.
539009	CRICKET COMMUNICATIONS, INC.
179017	CRICKET COMMUNICATIONS, INC.
249001	CRICKET COMMUNICATIONS, INC.
299024	CRICKET COMMUNICATIONS, INC.
449065	CRICKET COMMUNICATIONS, INC.
509008	CRICKET COMMUNICATIONS, INC.
199017	CRICKET COMMUNICATIONS, INC.
529017	CRICKET COMMUNICATIONS, INC.



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3060-0819

## Affiliated ETCs

SAC	Name
339035	CRICKET COMMUNICATIONS, INC.
229014	GEORGIA RSA#8 PARTNERSHIP
345070	ILLINOIS BELL TELEPHONE COMPANY
325080	INDIANA BELL TELEPHONE COMPANY, INC.
315090	MICHIGAN BELL TELEPHONE COMPANY
555173	NEVADA BELL TELEPHONE COMPANY
209012	NEW CINGULAR WIRELESS PCS, LLC
269905	NEW CINGULAR WIRELESS PCS, LLC
279010	NEW CINGULAR WIRELESS PCS, LLC
289912	NEW CINGULAR WIRELESS PCS, LLC
319026	NEW CINGULAR WIRELESS PCS, LLC
339920	NEW CINGULAR WIRELESS PCS, LLC
389015	NEW CINGULAR WIRELESS PCS, LLC
409004	NEW CINGULAR WIRELESS PCS, LLC
449022	NEW CINGULAR WIRELESS PCS, LLC
479006	NEW CINGULAR WIRELESS PCS, LLC
619004	NEW CINGULAR WIRELESS PCS, LLC
545170	PACIFIC BELL TELEPHONE COMPANY
405211	SOUTHWESTERN BELL TELEPHONE COMPANY
415214	SOUTHWESTERN BELL TELEPHONE COMPANY
425213	SOUTHWESTERN BELL TELEPHONE COMPANY
435215	SOUTHWESTERN BELL TELEPHONE COMPANY
445216	SOUTHWESTERN BELL TELEPHONE COMPANY
305150	THE OHIO BELL TELEPHONE COMPANY
135200	THE SOUTHERN NEW ENGLAND TELEPHONE CO.
335220	WISCONSIN BELL, INC.